

IN THE UNITED STATES DISTRICT COURT OF
THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

Donald Broussard

Plaintiff

v.

ENI US Operating Co., Inc.

Defendant

§
§
§
§
§
§
§
§
§

C.A. NO. 3:13-cv-349

PLAINTIFF'S EXHIBIT LIST

No.	DESCRIPTION	OFFER	OBJ	DATE	
				ADMIT	N/ADMIT
1.	7/2/2013 ENI INJURY/ILLNESS REPORT (000001-000002)				
2.	7/2/2013 ENI US OPERATING INJURY/ILLNESS REPORT & WOOD GORUP PSN INITIAL INCIDENT NOTIFICATION (ACADIANA CENTER FOR ORTHOPEDIC & OCCUPATION MEDICINE, LLC (DR. GIDMAN) WORK RELEASE 7.5.13 ATTACHED) (ENI 0003-0005)				
3.	6/20/2013 ENI PETROLEUM SERVICE PROVIDER SAFETY ORIENTATION CHECKLIST FOR DONALD BROUSSARD (ENI 0006)				
4.	SAFETY MEETING MINUTES - 6.23.13 & 6.30.13 (ENI 0007-0010)				
5.	INFIRMARY LOG (ENI 0011)				
6.	6/27/2013 A&B VALVE AND PIPING SYSTEMS LLC PACKING LIST (ENI 0012)				

7.	7/30/2013 MASTER SERVICE AGREEMENT BETWEEN ENI US OPERATING CO. INC. AND ODL, INC. AND WOOD GROUP PSN, INC. (ENI 0013-0061)				
8.	6/29/2013 JSA (ENI 0063-0064)				
	<i>EXPERTS</i>				
9.	CV OF JACK MADELEY				
10.	6/25/2014 REPORT OF JACK MADELEY				
11.	CV OF TODD COWEN, M.D.				
12.	8/19/2014 TODD COWEN, M.D. LIFE CARE PLAN (000004-000037)				
13.	CV OF JEFF PETERSON				
14.	7/1/2014 REPORT OF JEFF PETERSON				
15.	CV OF KENNETH MCCOIN, PH.D.				
16.	6/24/2014 REPORT OF KENNETH MCCOIN, PH.D.				
17.	SOCIAL SECURITY ADMINISTRATION - EARNINGS RECORDS (R000650-R000662)				
18.	INTERNAL REVENUE SERVICE TAX RETURNS (R000612-R000649)				
	<i>MEDICAL RECORDS</i>				
19.	DR. GREGORY GIDMAN				
20.	LABORDE DIAGNOSTICS - NO MEDICAL (RADIOLOGY & BILLING ONLY)				
21.	DR. GEORGE WILLIAMS				

22.	OPELOUSAS GENERAL HOSPITAL (8/2/2013-8/8/2013)				
23.	HOME HEALTH CARE				
24.	SOUTHWEST NEUROSCIENCE CENTER				
25.	SURGICAL ASSOCIATES OF OPELOUSAS				
26.	OPELOUSAS GENERAL HOSPITAL (7/30/2014-8/2/2014)				
	<i>RADIOLOGY RECORDS</i>				
27.	DR. GREGORY GIDMAN				
28.	LABORDE DIAGNOSTICS				
29.	OPELOUSAS GENERAL HOSPITAL				
	<i>BILLING RECORDS</i>				
30.	DR. GREGORY GIDMAN				
31.	LABORDE DIAGNOSTICS				
32.	DR. GEORGE WILLIAMS				
33.	OPELOUSAS GENERAL HOSPITAL				
34.	ACADIANA INTRAOPERATIVE MONITORING				
35.	HOME HEALTH CARE				
36.	SOUTHWEST NEUROSCIENCE CENTER				
37.	SURGICAL ASSOCIATES OF OPELOUSAS				
38.	ANESTHESIA ASSOCIATES OF OPELOUSAS				
	<i>DEPOSITION EXHIBITS</i>				

39.	EXHIBIT 1 TO DEPOSITION OF DONALD BROUSSARD				
40.	EXHIBIT 2 TO DEPOSITION OF DONALD BROUSSARD				
41.	EXHIBIT 1 TO DEPOSITION OF JAMES GULDE				
42.	EXHIBIT 2 TO DEPOSITION OF JAMES GULDE				
43.	EXHIBIT 1 TO DEPOSITION OF KEVIN TWIDT				
44.	EXHIBIT 2 TO DEPOSITION OF KEVIN TWIDT				
45.	EXHIBIT 3 TO DEPOSITION OF KEVIN TWIDT				
46.	EXHIBIT 4 TO DEPOSITION OF KEVIN TWIDT				
47.	EXHIBIT 5 TO DEPOSITION OF KEVIN TWIDT				
48.	EXHIBIT 6 TO DEPOSITION OF KEVIN TWIDT				
49.	EXHIBIT 1 TO DEPOSITION OF GEORGE WILLIAMS, MD				
50.	EXHIBIT 2 TO DEPOSITION OF GEORGE WILLIAMS, MD				
51.	EXHIBIT 3 TO DEPOSITION OF GEORGE WILLIAMS, MD				
52.	EXHIBIT 4 TO DEPOSITION OF GEORGE WILLIAMS, MD				
53.	EXHIBIT 5 TO DEPOSITION OF GEORGE WILLIAMS, MD				
54.	EXHIBIT 6 TO DEPOSITION OF GEORGE WILLIAMS, MD				
55.	EXHIBIT 7 TO DEPOSITION OF GEORGE WILLIAMS, MD				
56.	EXHIBIT 8 TO DEPOSITION OF GEORGE WILLIAMS, MD				
57.	EXHIBIT 9 TO DEPOSITION OF GEORGE WILLIAMS, MD				

58.	EXHIBIT 10 TO DEPOSITION OF GEORGE WILLIAMS, MD				
59.	EXHIBIT 11 TO DEPOSITION OF GEORGE WILLIAMS, MD				
60.	EXHIBIT 12 TO DEPOSITION OF GEORGE WILLIAMS, MD				
61.	EXHIBIT 13 TO DEPOSITION OF GEORGE WILLIAMS, MD				
62.	EXHIBIT 14 TO DEPOSITION OF GEORGE WILLIAMS, MD				
63.	EXHIBIT 15 TO DEPOSITION OF GEORGE WILLIAMS, MD				
64.	EXHIBIT 16 TO DEPOSITION OF GEORGE WILLIAMS, MD				
65.	EXHIBIT 17 TO DEPOSITION OF GEORGE WILLIAMS, MD				
66.	EXHIBIT 18 TO DEPOSITION OF GEORGE WILLIAMS, MD				
67.	EXHIBIT 19 TO DEPOSITION OF GEORGE WILLIAMS, MD				
68.	EXHIBIT 20 TO DEPOSITION OF GEORGE WILLIAMS, MD				
69.	EXHIBIT 21 TO DEPOSITION OF GEORGE WILLIAMS, MD				
70.	EXHIBIT 22 TO DEPOSITION OF GEORGE WILLIAMS, MD				
71.	EXHIBIT 23 TO DEPOSITION OF GEORGE WILLIAMS, MD				
72.	EXHIBIT 24 TO DEPOSITION OF GEORGE WILLIAMS, MD				
73.	EXHIBIT 1 TO DEPOSITION OF JACK MADELEY				
74.	EXHIBIT 2 TO DEPOSITION OF JACK MADELEY				
75.	EXHIBIT 3 TO DEPOSITION OF JACK MADELEY				
76.	EXHIBIT 4 TO DEPOSITION OF JACK MADELEY				

77.	EXHIBIT 5 TO DEPOSITION OF JACK MADELEY				
78.	EXHIBIT 6 TO DEPOSITION OF JACK MADELEY				
79.	EXHIBIT 7 TO DEPOSITION OF JACK MADELEY				
80.	EXHIBIT 8 TO DEPOSITION OF JACK MADELEY				
81.	EXHIBIT 9 TO DEPOSITION OF JACK MADELEY				
82.	EXHIBIT 1 TO DEPOSITION OF JEFF PETERSON				
83.	EXHIBIT 2 TO DEPOSITION OF JEFF PETERSON				
84.	EXHIBIT 3 TO DEPOSITION OF JEFF PETERSON				
85.	EXHIBIT 4 TO DEPOSITION OF JEFF PETERSON				
86.	EXHIBIT 5 TO DEPOSITION OF JEFF PETERSON				
87.	EXHIBIT 6 TO DEPOSITION OF JEFF PETERSON				
88.	EXHIBIT 7 TO DEPOSITION OF JEFF PETERSON				
89.	EXHIBIT 8 TO DEPOSITION OF JEFF PETERSON				
90.	EXHIBIT 9 TO DEPOSITION OF JEFF PETERSON				
	<i>MISCELLANEOUS</i>				
91.	DOCUMENTS RECEIVED FROM WOOD GROUP IN RESPONSE TO PLAINTIFF'S SUBPOENA (WG 000001-000227)				

Plaintiff reserves the right to supplement his exhibit list should additional documents be identified or produced prior to trial. In addition, Plaintiff reserves the right to use all exhibits identified by Defendant at the time of trial.